

Airport Authority of Washoe County

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JUL 11 1994
FCC - MAIL ROOM

July 1, 1994

Mr. W. Caton
Acting Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC 20554

Re: Docket No. 92-77

Dear Mr. Caton:

The present presubscription system for 0+ InterLATA payphone traffic adequately balances the needs of consumers for access to carriers of choice and the needs of airport property owners for the associated revenues that defray capital and operating costs. The implementation of Billed Party Preference (BPP), with respect to airports, eliminates payphone commissions as a source of revenue and will result in increased consumer costs and a reduction in consumer service.

Many airports across the nation, including Reno Cannon International Airport, must compute the rates and charges airlines pay for using airport facilities by offsetting the airports' actual cost of providing those facilities with concession revenues, including payphone commissions. The implementation of BPP eliminates these commissions and would therefore increase the rates and charges airlines pay. Due to the current financial difficulties of the airlines, this increase would probably be passed on to consumers in the form of increased ticket prices.

Airports are exceptionally cognizant of the importance of consumer service. A major component of consumer service is convenience in terms of the ease of access to services such as ticket counters, baggage claim areas and payphones. If BPP is implemented and payphone commissions are eliminated, airports will be forced to relocate many of the payphones away from the high traffic/convenience locations in which they are typically located. These payphones will then be replaced with revenue producing concessions in an effort to replace the lost payphone commissions. Airports recognize the importance of payphones to their customers and will never eliminate them from their premises, but, if BPP is implemented, the consumer service associated with payphones will be reduced out of economic reality.

Please contact me if you desire my further clarification or expansion of this issue. My telephone number is 702/328-6480.

Sincerely,

Robert C. White
Executive Director

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JEFFCO AIRPORT
Denver's Corporate Choice

July 1, 1994

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Mr. W. Caton
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Dear Mr. Caton

Recently the Jefferson County Airport was informed of a proposed rulemaking regarding Billed Party Preference (BPP). I would like to take this time to express our concerns about BPP.

Airport Management

David C. Gordon, A.A.E.,
Airport Manager

Robert T. Lohne, A.A.E.,
Assistant Airport Manager

According to the documents that I have read, the FCC appears to be making assumptions about the resulting effects on the public entities. The cost of building this system seems to be very overwhelming for the telephone service carriers. Therefore the cost will definately trickle down to the end user effecting every one on the way. The question comes up why spend an enormous amount of money creating a service that already exists through a few key strokes on a telephone?

Airport Authority Commissioners

Dr. David D. Callender
Robert J. Fairchild
Edward N. Haase
Frederick J. Pattridge
Jim Thyfault

Until the FCC knows the exact cost and how it is going to effect the quality of the service, a ruling on this matter is premature.

Thank you for your time
Sincerely,

JEFFERSON COUNTY AIRPORT AUTHORITY

Troy W. Stover

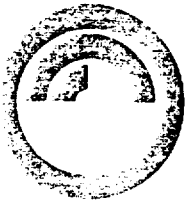
Troy W. Stover
Administrative Support I

11755 Airport Way
Terminal Building
Broomfield, Colorado 80021

Phone: (303) 466-2314
Fax: (303) 438-2017

FAA Control Tower • ILS on 29R
Surface Runways: 29R-11L (9,000')
29L-11R (7,000') 20-02 (3,600')

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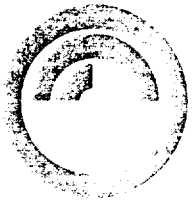
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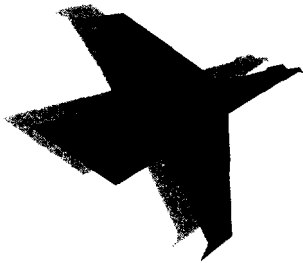
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FAA Control Tower • ILS on 29R
Surface Runways: 29R-11L (9,000')
29L-11R (7,000') 20-02 (3,600')

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PACIFIC TELCOM

PAY TELEPHONE OWNERS AND OPERATORS

MEMBER

NORTH AMERICAN TELECOMMUNICATIONS ASSOCIATION

AMERICAN PUBLIC COMMUNICATIONS COUNCIL

CALIFORNIA PAYPHONE ASSOCIATION

NEVADA PAYPHONE ASSOCIATION

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June 30, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communication Commission
1919 M Street NW - Room 814
Washington, D.C. 20554

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RE: Billed Party Preference/CC Docket No. 92-77.

I must express our opposition to your agency's proposal to implement the costly Billed Party Preference (BPP). We own and operate pay telephones in California and Nevada and BPP will drastically alter our ability to continue to provide the public with quality telecommunication service.

All our phones are programmed to be in compliance with the Telephone Operator Consumer Services Improvement Act of 1990 (TOCSIA) to allow callers to access the carrier of their choice. BPP is clearly a redundant and unnecessary federal response to a problem that has already been effectively resolved.

BPP will impose new and unnecessary costs and inconvenience for consumers. Consumers will be faced with longer call set up times and will need to repeat billing information to two operators on some calls.

The commission must address the high risk for increased fraud that will occur with BPP. There are numerous local exchange carriers (LEC) that cannot afford to implement the enhanced screening features necessary to prevent fraud. Smaller long distance companies may also lack the ability to prevent the fraud that BPP will bring.

Competition and innovation will be eliminated by BPP. Prior to competition from independent payphones and operator service providers the LECs were the monopoly providers for communication needs. BPP will restore the LEC's bottleneck control over the initiation and routing of 0+ calls and enable them to further their own objectives at our expense.

As any other business, we are concerned about the rates charged to consumers. If the Commission feels consumers need more protection it would seem that the better alternative to BPP would be to establish and enforce reasonable rate ceilings.

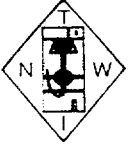
We respectfully ask the Commission to reject the BPP proposal. Thank you for your time and consideration.

Sincerely,
PACIFIC TELCOM

W. M. Jarrett, Jr.
W. M. Jarrett, Jr., President

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TELCO NORTHWEST, INC.

15838 S.W. Upper Boones Ferry Rd. • Lake Oswego, OR 97035 • (503) 620-3173

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The Honorable Reed H. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW - Room 814
Washington, DC 20554

RE: Billed Party Preference/CC Docket No. 92-77

Dear Chairman Hundt:

I am writing this letter to your agency to register our opposition to Billed Party Preference (BPP.)

Our Company operates approximately 1000 coin operated pay telephones in five states. BPP would make it very difficult to continue providing good service to the consumer.

We now allow callers to access the carriers of their choice. BPP, in our opinion, is an unnecessary response to a problem that has been resolved.

We respectfully ask the commission to reject the Billed Party Preference proposal.

Sincerely,

TELCO WEST, INC.

EVERT G. BROWN

EGB/ms

cc's The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness

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NEVADA PAYPHONE ASSOCIATION

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The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW - Room 814
Washington, D.C. 20554

Re: Billed Party Preference/CC Docket No. 92-77

Dear Chairman Hundt:

We are writing to express our opposition to your agency's proposal to implement Billed Party preference ("BPP") throughout the telephone network. Our association represents several independent payphone providers ("IPP's") in the state of Nevada. We are responsible for procuring and overseeing the operation of telecommunications facilities and services, including pay telephone and other telephone systems located at our facilities. BPP will drastically alter our ability to continue to provide the public with quality telecommunications service.

Our phones are all programmed to allow callers to access the carrier of their choice, in compliance with the Telephone Operator Consumer Services Improvement Act of 1990 (TOCSIA). BPP is in our opinion an unnecessary federal response to a problem that has already effectively been resolved.

BPP will cost billions to implement and the consumers will ultimately bear the cost. Additionally, consumers will be faced with longer call set up times and will need to repeat billing information on some calls.

BPP will effectively eliminate competition and innovation. Prior to deregulation the local exchange carriers ("LEC's") were the monopoly providers of public communications. Competition has brought new service options, greater responsiveness to our needs and fair commission structures. BPP will allow the LEC's total control over the initiation and routing of 0+ calls and enable them to further their own objectives at our expense.

As in any business, we are concerned about the rates charged to consumers. We require our payphone providers and OSP's to only charge competitive rates. If the Commission feels consumers need additional protection, it would seem that a better alternative to BPP would be to establish and enforce reasonable rate ceilings.

We respectfully ask the commission to reject the Billed Party preference proposal.

Sincerely,


Albert Mednicoff

President

IM/dtj

cc's

The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness

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